



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker
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July 29, 2016

Mr. David Brunato
Suddekor, LLC
240 Bowles Road
Agawam, MA 01001

RE: Agawam
Transmittal No.: X271412
Application No.: WE-16-013
Class: *OP*
FMF No.: 329948
AIR QUALITY PLAN APPROVAL

Administrative Amendment

Dear Mr. Brunato:

The Department of Environmental Protection, Western Regional Office ("MassDEP") received on July 21, 2016, a request to administratively amend the existing Non-Major Comprehensive Plan Approval #WE-12-017 for Suddekor, LLC, located at 204 Bowles Road in Agawam, Massachusetts ("Facility"). The requested amendment proposes to remove the facility-wide volatile organic compound (VOC) emission limit of 10 tons in any 12 consecutive month period and 1.5 tons per month since the restriction is prohibiting increased production at the facility.

According to Plan Approval #WE-12-017, the facility-wide VOC emission limits were based on the Facility's discussions with the United States Environmental Protection Agency (USEPA) during an Administrative Order Penalty Mitigation meeting. However, the existing facility-wide VOC emission limits do not serve any useful purpose as they do not avoid an otherwise applicable requirement.

Therefore, MassDEP has approved the administrative amendment to remove the facility-wide VOC emission limit of 10 tons in any 12 consecutive month period and 1.5 tons per month since it is in compliance with the administrative amendment regulations contained in 310 CMR 7.02(13). Accordingly, MassDEP issues this Administrative Amendment incorporating the requested change.

In addition, the Permittee shall submit the written notification requirements to MassDEP and USEPA in accordance with 310 CMR 7.00 Appendix C(7)(a)5.a. through d. in order to make the Section 502(b)(10) change to the Facility's operating permit. If the requirements of 310 CMR

7.00: Appendix C(7) are met, the change (removal of the facility-wide VOC emission limit) may be made 15 days after receipt of the notice of the change by the MassDEP or USEPA whichever is later.

This Plan Approval Administrative Amendment replaces Plan Approval # WE-12-007, issued September 12, 2012, in its entirety. This administrative amendment only removes the facility-wide VOC emission limits and does not change any other existing requirement/limitation, including the BACT requirements established pursuant to 310 CMR 7.02(8)(a)2.

1. DESCRIPTION OF FACILITY AND APPLICATION

Suddekor, LLC has submitted an application to voluntarily restrict their facility-wide volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions at their Agawam facility as a result of the March 22, 2012 Administrative Order with the United States Environmental Protection Agency. In addition to the facility wide emission limits, Suddekor, LLC has proposed to restrict the total and individual HAP emissions from the two existing production printing presses at the facility.

Suddekor, LLC is a rotogravure printer which produces decorative paper utilized in the manufacture of laminate flooring in the North American laminate industry. The facility commenced operation on April 17, 2000. The existing air contaminant sources at the facility consist of:

- A seven-foot wide Kochsiek production printing press with a 5.7 million Btu per hour natural gas-fired dryer
- A seven-foot wide Kochsiek production printing press with a 7.1 million Btu per hour natural gas-fired dryer
- A Giave lab development press with a 1.8 million Btu per hour natural gas-fired dryer
- A Giave lab development press with a 2.1 million Btu per hour natural gas-fired dryer
- A hard chromium electroplating process and associated centrifugal spray scrubber

There are no VOC or HAP-containing cleanup solvents used at this facility. Only water is used for cleanup purposes.

The two Kochsiek production printing presses coat paper using inks that contain VOCs and HAPs and are operating in accordance with Plan Approval #1-P-02-023, issued January 14, 2003. According to Plan Approval #1-P-02-023, the Kochsiek presses are each limited to emit no more than 1.0 tons of VOC per month and 7.0 tons of VOC in any 12 consecutive month period. The associated dryers to each of the production presses are exempt from plan approval pursuant to 310 CMR 7.02(b)15.

The two Giave lab presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)7. since Suddekor, LLC maintains records to demonstrate that the actual emissions of VOCs and HAPs are each less than 1 ton per year. As part of this plan approval, Suddekor, LLC has proposed to establish emission limits for each of the lab presses to less than 1 ton per year for

VOCs and less than 1 ton per year for total HAPs. The associated dryers to each of the lab presses are exempt from plan approval pursuant to 310 CMR 7.02(b)15.

The hard chromium electroplating process is operating in accordance with Plan Approval #1-P-00-004, issued March 23, 2000. According to Plan Approval #1-P-00-004, the total chromium concentration from the electroplating process shall not exceed 0.015 milligrams per dry standard cubic meter.

The proposed facility-wide HAP emissions are provided in the table below and were based on the facility's discussions with the United States Environmental Protection Agency during an Administrative Order Penalty Mitigation meeting.

Table 1. Facility-Wide Emission Limits

Air Pollutant	Tons/Month	Tons/Year
Total HAPs	1.0	7.7

Table 1 Notes:

HAPs = hazardous air pollutants

tons/month = tons per calendar month

tons/year = tons in any 12 consecutive month period

Best Available Control Technology Analysis

There are currently no existing HAP emission limits contained in Plan Approval #1-P-02-023 for each of the production presses. Therefore, Suddekor, LLC has proposed to limit the HAP emissions from the two existing Kochsiek production printing presses to satisfy the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. To satisfy BACT, the permittee has proposed to limit the total HAP content of the inks to no more than 1.04 % by weight as applied which is based on the worst case ink as applied. This restriction will result in a maximum annual total HAP emission rate of 3.942 tons for each production printing press. Suddekor, LLC will also implement work practices to minimize the evaporation of VOCs and HAPs, including the use of cleanup solvents which do not contain any VOCs or HAPs. MassDEP agrees with this BACT determination.

2. **EMISSION UNIT (EU) IDENTIFICATION**

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	Rotogravure Production Press Kochsiek / Natural Gas-Fired Drying Oven	350 meters/minute 5,650,352 Btu/hour	None
2	Rotogravure Production Press M-1 Kochsiek / Natural Gas-Fired Drying Oven	450 meters/minute 7,062,940 Btu/hour	None
3	Rotogravure Lab Press//Natural Gas-Fired Drying Oven	120 meters/minute 1,765,735 Btu/hour	None
4	Rotogravure Lab Press/ Natural Gas-Fired Drying Oven	120 meter/ minute 2,118,882 Btu/hour	None
5	Hard Chromium Electroplating Process	Rectifier Capacity = 8,000 amperes	Mist eliminator and multi- stage composite mesh pad with a final stage HEPA filter

Table 1 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

Btu = British Thermal Unit

HEPA = High-Efficiency Particulate Air

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
1	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings shall not exceed a HAP content of 1.04% by weight as applied.	Total HAP	≤1.0 tons per month and ≤3.94 tons in any 12 consecutive month period
2	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings shall not exceed a HAP content of 1.04% by weight as applied.	Total HAP	≤1.0 tons per month and ≤3.94 tons in any 12 consecutive month period
3	None	VOC	< 1.0 ton in any 12 consecutive month period
		Total HAP	< 1.0 ton in any 12 consecutive month period
4	None	VOC	< 1.0 ton in any 12 consecutive month period
		Total HAP	< 1.0 ton in any 12 consecutive month period
Facility-wide	None	Total HAP	≤1.0 ton per month and ≤7.7 tons in any 12 consecutive month period

Table 2 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compound

HAP =Hazardous Air Pollutant

≤ = less than or equal to

< = less than

% = percent

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
1 2	1. The Permittee shall monitor on a calendar month basis for EU #1 and #2: <ol style="list-style-type: none"> Identity, quantity, formulation and density of coatings used; Identity, quantity, formulation and density of any diluents(s) and clean-up solvents used; Solids content of any coating(s) used; Quantity of product processed; The HAP content, as applied, of the coatings used; The pounds of HAPs emitted by EU #1; and The pounds of HAPs emitted by EU #2.
Facility-wide	2. The Permittee shall monitor on a calendar month basis, the total pounds of HAP emitted from the entire facility.
	3. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration
	4. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:

EU# = Emission Unit Number

HAPs = Hazardous Air Pollutants

USEPA = United States Environmental Protection Agency

Table 4	
EU#	Record Keeping Requirements
1 2	1. The Permittee shall maintain daily records which shall include but are not limited to: <ol style="list-style-type: none"> Identity, quantity, formulation and density of coatings used; Identity, quantity, formulation and density of any diluents(s) and clean-up solvents used; Solids content of any coating(s) used; Quantity of product processed; and The HAP content of the coatings used as applied.
1	2. The Permittee shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of HAPs emitted from EU #1.
2	3. The Permittee shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of HAPs emitted from EU #2.
3	3. The Permittee shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of VOC and HAP emitted from EU #3.
4	4. The Permittee shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of VOC and HAP emitted from EU #4.
Facility-wide	5. The Permittee shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of HAP emitted from the entire facility.
	6. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	7. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	8. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
	9. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	10. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	11. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.

Table 4	
EU#	Record Keeping Requirements
Facility-wide	12. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	13. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number
 HAP = Hazardous Air Pollutant
 PCD = Pollution Control Device
 SOMP = Standard Operating and Maintenance Procedure
 USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Western Regional Office of MassDEP, BWP Permit Chief by telephone [413-755-2115], email, [marc.simpson@state.ma.us] or fax [413-784-1149], as soon as possible, but no later than three (3) days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to the Permit Chief at MassDEP within ten (10) days of discovery and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report annually to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU# = Emission Unit Number
 BWP = Bureau of Waste Prevention

4. **SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
Facility-wide	<ol style="list-style-type: none"> Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall only use cleanup solvents which do not contain VOCs or HAPs. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices: <ol style="list-style-type: none"> Store all VOC and/or HAP-containing inks, coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers; ensure that mixing and storage containers used for VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; minimize spills of VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials; convey VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing inks, coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval. The Permittee shall submit to MassDEP within 90 days of this Final Approval an updated version of it's BWP AQ14 Air Quality Initial Operating Permit application reflecting the requirements of this Final Approval. The revised application should also include the specific applicable regulations from 310 CMR 7.00 as well as each applicable requirement contained in the National Emission Standards for Hazardous Air Pollutants such as 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks), 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry), etc. for each source at your facility.

Table 6 Key:

EU# = Emission Unit Number

CFR = Code of Federal Regulations

BWP = Bureau of Waste Prevention

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	30	2.5	1000-1100	Ambient – 230
2	30	2.5	1000-1100	Ambient – 230
3 and 4	30	2.5	1000-1100	Ambient – 230
5	30	1.17	1400-1600	75-85

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at 413-755-2234, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Marc Simpson
Air Quality Permit Chief
Bureau of Air and Waste
Western Region

cc: WERO AQ plan file
WERO AQ approval file

ecc: Yi Tian, MassDEP Boston
Peter Czapienski, MassDEP Western Region